

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

TEXAS ASSOCIATION FOR MONEY SERVICES BUSINESSES (TAMSB); HIGH VALUE, INC.; REYNOSA CASA DE CAMBIO, INC.; NYDIA REGALADO d/b/a BEST RATE EXCHANGE; MARIO REGALADO d/b/a BORDER INTERNATIONAL SERVICES; LAREDO INSURANCE SERVICES, LLC; E.MEX. FINANCIAL SERVICES, INC.; R & C, INC. d/b/a TEMEX MONEY EXCHANGE; SAN ISIDRO MULTI SERVICES, INC.; CRISTWIN INC. d/b/a BROWNSVILLE CASA DE CAMBIO; ESPRO INVESTMENT LLC d/b/a LONESTAR MONEY EXCHANGE; and ARNOLDO GONZALEZ, Jr.,

Plaintiffs,

v.

PAM BONDI, Attorney General of the United States; SCOTT BESSENT, Secretary of the Treasury; UNITED STATES DEPARTMENT OF THE TREASURY; ANDREA GACKI, Director of the Financial Crimes Enforcement Network; and FINANCIAL CRIMES ENFORCEMENT NETWORK,

Defendants.

Civil Case No. 5:25-cv-00344-FB

DECLARATION OF DAVID N. DELGADO
OF CRISTWIN INC. D/B/A BROWNSVILLE CASA DE CAMBIO

I, David Delgado, being of competent mind, declare as follows:

1. I am a United States citizen and a resident of Brownsville, Texas. I am 57 years old.

2. I am the operator of Cristwin, Inc. D/B/A Brownsville Casa de Cambio a Texas company, which is a plaintiff in the above-captioned civil action.

3. I manage the company on a day-to-day basis. I have the authority to speak for Cristwin, Inc. D/B/A Brownsville Casa de Cambio.

4. Cristwin, Inc. D/B/A Brownsville Casa de Cambio is registered with the federal Financial Crimes Enforcement Network ("FinCEN") as a Money Services Business ("MSB") because it offers currency exchange services.

5. Because it offers those services in 78520, Cristwin, Inc. D/B/A Brownsville Casa de Cambio is subject to FinCEN's March 14, 2025, geographic targeting order (the "Border GTO") requiring MSBs to file Currency Transaction Reports ("CTRs") for cash transactions over \$200.

6. I estimate that at least 300 transactions per week that exceed more than \$200 and would require a CTR under the Border GTO.

7. I know that a CTR is currently required for cash transactions of \$10,000 or more. Before the Border GTO came into effect, I have filed no CTRs, because we had no transactions above \$10,000.

8. The Border GTO is going to radically increase the number of CTRs that we have to file. In a typical month, we do 1,200 cash transactions over \$200 within the covered zip codes.

9. If transaction volume remains the same under the Border GTO, filing all of those additional CTRs would take 80 hours per week of additional time. Our employees simply do not have time to fill out all that additional paperwork. We would need to hire, at least, 2 new employees to handle the administrative tasks necessary to complete 1,200 CTRs per month.

10. Under our current procedures, we collect some customer information for some kinds of transactions. However, for transactions under \$10,000 we do not provide that information

to the federal government.

11. We value our customers' privacy, and when we collect information from our customers we comply with all applicable privacy laws.

12. We also value the privacy of our business records, and we treat information about transactions at our business as proprietary business information.

13. We currently conduct some transactions over \$200 but below \$3,000 without collecting any information from our customers.

14. The Border GTO forces us to collect information on our customers that we would not otherwise collect and to report information to the federal government that we would not otherwise report.

15. Many customers will not want to provide their sensitive personal information every time they do legal, low-dollar, everyday transactions. And, since the Border GTO does not apply to every zip code, they can take their business to other businesses that are not affected.

16. The Border GTO will either drive away our customers or, if it does not, will impose massive and unsupportable compliance costs. Either way, the impact on our business will be catastrophic.

I declare under penalty of perjury that the foregoing is true and correct.

DATED and SIGNED this 9th day of May, 2025.



David Delgado